SQUIRE PATTON BOGGS

Jonathon Bloomberg



Of Counsel

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About Jonathon

Jon Bloomberg is a member of the Environmental, Safety & Health Practice with more than 30 years of experience. He provides compliance counseling to clients, manages permitting on behalf of clients, handles enforcement actions, evaluates transactional risk management, and has served on crisis management and internal investigation teams.

Jon has also advised companies on sustainability programs and managed large multidiscipline project development teams.

Jon has more than 20 years of experience serving as counsel to various companies in the refining and petrochemical industry. In addition, he has represented clients in the fuel transportation, ethanol and food processing, mining and waste incinerators spaces. He has experience working with clients in the manufacturing industry, including experience with milling, machining, extruding and coating facilities.

Prior to joining the firm, Jon was assistant general counsel at a multistate energy and utility company providing advice, counsel and strategy on air regulation, federal and state air policy, coal ash management and other compliance matters across an eight-state area.

Jon also has 10 years of teaching experience, having served as an adjunct professor at the University of St. Thomas Law School, where he taught administrative law and environmental law, and at William Mitchell College of Law, where he taught environmental regulations.

Experience

- Advised a large national utility on air regulation and air policy issues.
- Negotiated a groundbreaking environmental reinvention agreement with the US Environmental Protection Agency (EPA), creating a new streamlined approach to regulating facility emissions.
- Negotiated a novel Clean Air Act compliance agreement for a large industrial facility providing for significant emission reduction commitments.
- Served as acting in-house environmental counsel for a major petroleum refiner and a large petrochemical company. Dealt with facility-specific issues involving all major environmental programs, including Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act (RCRA) and Emergency Planning and Community Right-to-Know Act (EPCRA) issues.
- On negotiating team for first consent decree issued as part of EPA's refinery enforcement initiative; managed consent decree compliance for multiple facilities and different clients; successfully closed multi-facility refinery consent decree.
- Established multi-facility compliance programs for refinery and petrochemical companies across the range of federal programs, including Clean Air Act, Clean Water Act, RCRA and EPCRA.
- Managed compliance audits for multiple refining and petrochemical facilities, including air permitting, air programs (New Source Performance Standards and Maximum Achievable Control Technology), water permitting and compliance, RCRA compliance, Spill Prevention, Control, and Countermeasure compliance and EPCRA reporting.
- Responded to multiple state and federal requests for information across a range of facilities and issues, including significant federal new source review inquiries.
- Resolved alleged state and federal noncompliance with a range of outcomes from no enforcement to federal consent decrees.
- Permitted several billion dollars' worth of projects: refinery expansions, greenfield developments, copper nickle mining projects and others.
- Negotiated RCRA Consent Agreements/Final Orders in multiple EPA jurisdictions.
- Managed internal investigations, corrective action planning and implementation, and subsequent regulatory disclosure of issues.
- Managed state and federal rulemaking interactions, seeking to clarify, comment on, or challenge new rules. Multiple interactions with senior EPA leadership, the Office of Enforcement and Compliance Assurance and the Office of Air Quality Planning and Standards on rule interpretation and clarification issues. Drafted and gained approval of novel regulatory approach for gas fired turbines.
- Assisted with the development of material sourcing and sustainability initiatives at a major building products manufacturer.
- Assisted in planning for and successful environmental review (state and federal Environmental Impact Statement) of MSP airport expansion.

Credentials

Education

- Cornell University, J.D., *magna cum laude*, Order of the Coif, Editorial Board, *Cornell Law Review*, 1988
- University of Minnesota, B.S., *cum laude*, 1985

Admissions

- Ohio, 2023
- Minnesota, 1988

Memberships & Affiliations

- Founding member, board member, board chair, Environmental Initiative, 2010-2019
- Board member, Air and Waste Management Association, Upper Midwest Section, 2014-2018
- Citizen member and vice-chair of Minnesota Environmental Quality Board, 2003-2012
- Member, Minnesota Pollution Control Agency Commissioner Advisory Council, 2003-2004
- Member, Minneapolis Citizen Environmental Advisory Committee, 2009-2011
- Member, Minnesota Pollution Control Agency Reinvention Advisory Committee, 1994-1996
- Member, Minnesota State and American Bar Associations

Expertise

Services

- Litigation
- Environmental, Safety & Health

About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.